

## UNITED STATES DISTRICT COURT

for the  
WESTERN DISTRICT OF OKLAHOMA

*In the Matter of the Search of*  
Kik c/o MediaLab.AI Inc. accounts with the  
username Okcsparky

Case No: MJ-23-1025-STE

APPLICATION FOR SEARCH WARRANT

I, Shane Robinson, a federal law enforcement officer or attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following property (*identify the person or describe property to be searched and give its location*):

See Attachment A, which is attached and incorporated by reference.

Located in the Central District of California, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment B, which is attached and incorporated by reference.

The basis for the search under Fed. R. Crim.P.41(c) is (*check one or more*):

- ☒ evidence of the crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

*Code Section*

18 U.S.C. § 2252A

18 U.S.C. § 2252A

18 U.S.C. § 2252A

*Offense Description*

Distribution of child pornography

Receipt of child pornography

Possession of child pornography

The application is based on these facts:

See attached Affidavit of Special Agent Shane Robinson, Federal Bureau of Investigations, which is incorporated by reference herein.

☒ Continued on the attached sheet(s).

☐ Delayed notice of \_\_\_\_\_ days (*give exact ending date if more than 30 days*) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet(s).

  
Applicant's signature

SHANE ROBINSON  
SPECIAL AGENT  
FEDERAL BUREAU OF INVESTIGATIONS

Sworn to before me and signed in my presence.

Date: Dec 19, 2023

City and State: Oklahoma City, Oklahoma

  
Judge's signature  
SHON T. ERWIN, U.S. Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF SEARCH WARRANT**

I, Shane Robinson, a Special Agent with the Federal Bureau of Investigation (FBI), Oklahoma City, Oklahoma, being duly sworn, depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I have been employed as a Special Agent (SA) of the FBI since April 2023 and have been assigned to the Oklahoma City Division of the FBI, Norman Resident Agency. I have received training and consulted with other agents who have experience with cases involving child pornography and sexual exploitation of children. As a Special Agent, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States. The information contained in this Affidavit is based upon my personal knowledge and observation, my training, conversations with other law enforcement officers, and review of documents and records.

2. I am investigating the online activities of the user of the Kik messenger online account with username "Okcsparky" (the "**SUBJECT ACCOUNT**") who is believed to be Kraig Varney. This investigation, described more fully below, has revealed that an individual knowingly utilized Kik from the account with username "Okcsparky" to possess, receive and distribute child pornography, in violation of 18 U.S.C. § 2252A, and that there is probable cause to believe that evidence, fruits, and instrumentalities of such violations are located within the items to be seized.

3. I make this affidavit in support of an application for a search warrant for information associated with a certain account that is stored at a premises owned, maintained, controlled, or operated by Kik c/o MediaLab.Ai Inc., an electronic communications service and remote computing service provider headquartered at 8023 Beverly Blvd., Ste 1144, Los Angeles, CA, 90048. The account includes the Kik messenger online account with username "Okcsparky",

which is described in detail in Attachment A to this Affidavit, and seize therefrom the items described in Attachment B, which constitute instrumentalities, fruits, and evidence of violations of 18 U.S.C. § 2252A including possession, receipt, and distribution of child pornography. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A).

4. This investigation, described more fully below, has revealed that an individual knowingly utilized Kik from the **SUBJECT ACCOUNT**, to distribute, receive, and possess child pornography, in violation of 18 U.S.C. § 2252A, and that there is probable cause to believe that evidence, fruits, and instrumentalities of such violations are located within the information requested in Attachment B, associated with the **SUBJECT ACCOUNT**.

5. Since this Affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me regarding this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to support the issuance of a search warrant.

#### **TERMS**

6. Based on the training and experience of other law enforcement officers with whom I have had discussions I use the following technical terms and definitions:

a. An Internet Protocol (IP) address is a unique numeric address used by computers on the Internet. An IP address looks like a series of four numbers, each in the range of 0-255, separated by periods (e.g., 121.56.97.178). Every computer attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static, or long-



term, IP addresses. Other computers have dynamic, or frequently changing, IP addresses.

b. Records, documents, and materials as used herein, include all information recorded in any form, visual or aural, and by any means, whether in handmade, photographic, mechanical, electrical, electronic, or magnetic form.

### **BACKGROUND ON KIK MESSENGER**

7. As explained below, there is probable cause to believe that the user of the **SUBJECT ACCOUNT** is in violation of 18 U.S.C. § 2252A, in part, through the use of Kik Messenger—a free service easily downloaded from the Internet. Unlike other messenger apps, Kik usernames – not phone numbers – are the basis for Kik user accounts, so Kik users are in complete control of with whom they communicate. In addition, Kik features include more than instant messaging. Kik users can exchange images, videos, sketches, stickers and even more with mobile web pages.

8. The Kik app is available for download vis the App Store for most iOS devices such as iPhones and iPads and is available on the Google Play Store for Android devices. Kik can be used on multiple mobile devices, including cellular phones and tablets.

9. In general, Kik asks each of its subscribers to provide certain personal identifying information when registering for an account. This information can include the subscriber's full name, physical address, and other identifiers such as an e-mail address. However, this information is not verified by Kik.

10. Kik typically retains certain transactional information about the creation and use of each account on their systems. This information can include the date on which the account was created, the length of service, records of log-in (i.e., session) times and durations, the types of service utilized, the status of the account (including whether the account is inactive or closed), the

methods used to connect to the account, and other log files that reflect usage of the account. Kik often has records of the IP address used to register the account and the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices were used to access the account. In addition, generally Kik maintains at least the last 30 days of all communications for each Kik user.

11. Kik offers users the ability to create an identity within the app referred to as a “username.” This username is unique to the account and cannot be changed. No one else can utilize the same username. A Kik user would have to create a new account in order to obtain a different username. In addition to a username, a Kik user may display a traditional name within the app, hereinafter referenced as the user’s “handle.”

12. Given the ability for users to create multiple accounts that are not linked to a specific mobile device (i.e., a phone number), Kik has become a popular app used by people involved in the collection, receipt, and distribution of child pornography.

### **BACKGROUND OF INVESTIGATION**

13. This case originated on October 24, 2023, when your affiant received a lead from FBI Tampa Division, Sarasota Resident Agency. During their investigation, agents accessed a subject’s cellular device. On this device were conversations from an unidentified Kik group, which appeared to focus on the trading of videos and pictures of child sexual abuse material (CSAM).

14. On or about April 28, 2023, an individual using Kik username “Okcsparky,” posted multiple CSAM thumbnail pictures to this Kik group. One of the unidentified users in this group commented “Anymore rough ones?”, to which “Okcsparky” replied “Idk... I’m driven it’s hard to look through my shit”. After these comments, “Okcsparky” posted multiple CSAM thumbnail

pictures to the group.

16. On August 14, 2023, FBI Tampa Division issued an administrative subpoena to Kik, to provide information pertaining to subscriber information and IP logs associate with the username "Okcsparky" ("the **SUBJECT ACCOUNT**") from April 27, 2023, to August 14, 2023.

17. On August 16, 2023, FBI Tampa Division received Kik's response to the administrative subpoena. The response gave the following information regarding the **SUBJECT ACCOUNT**: email address: kraigvarney76@gmail.com; First Name: moving; Last Name: Left. The **SUBJECT ACCOUNT** was created on June 3, 2022. Finally, it stated on April 28, 2023, the date of the CSAM postings detailed above, the **SUBJECT ACCOUNT** utilized the IP address 68.12.212.15 to login to Kik.

18. Based on law enforcements investigation, the IP address 68.12.212.15 resolved to Cox Communications (Cox).

18. On August 31, 2023, FBI Tampa Division issued an administrative subpoena to Cox to provide information pertaining to subscriber information associated to the following: IP address 68.12.212.15, Port: 36078, Date: 2023-04-28 19:57:31 UTC 68.12.212.15, Port: 58504, Date: 2023-04-28 19:59:55 UTC 68.12.212.15, Port: 58808, Date: 2023-04-28 20:01:46 UTC.

19. On September 11, 2023, FBI Tampa Division received Cox's response to the administrative subpoena with the following information regarding the subscriber of the IP address 68.12.212.15, on the requested timeframe described above:

Name:	Kelly Watson
Address:	8300 NW 10th St, Apt 2, Oklahoma City, Oklahoma 73127
Phone:	(405) 627-8919 (405) 761-1802
E-Mail:	kellyin.pink@gmail.com

20. A search of Oklahoma Department of Public Safety provided current driver's license photo and residential information for Kelly Watson (Watson) who resides at 8300 NW



10th St., Apt. 2, Oklahoma City, Oklahoma 73127.

21. On November 1, 2023, your affiant conducted an open-source search and identified a Facebook account for Kelly Watson who states on her account that she resides in Oklahoma City, Oklahoma. Upon review, there were multiple photos of Watson. The Facebook photos and the driver's license photo appear to show the same person, which is Kelly Watson. Furthermore, Watson's email address kellyin.pink@gmail.com is similar to Kelly Watson's Facebook account, www.facebook.com/kellyin.pink.

22. On November 1, 2023, your affiant searched the Oklahoma Department of Corrections (DOC) database for Kraig Varney (VARNEY). According to VARNEY's criminal history, he served time in prison for drug trafficking and firearms related charges. VARNEY, born October 3, 1976, had several booking photographs in the database, including one photograph which showed the upper portion of a tattoo on VARNEY's chest. VARNEY is pictured in numerous photographs on Watson's Facebook account, including one photograph that shows his chest tattoo from the DOC database.

23. Your affiant believes Kraig VARNEY is the owner and user of the email address kraigvarney76@gmail.com and that he used this email to register the **SUBJECT ACCOUNT** with Kik referenced above.

24. On October 25, 2023, FBI Tampa Division followed FBI CSAM protocols and securely transferred CSAM which was distributed by "Okcsparky" in a Kik group text. Your affiant reviewed all of the images/videos, including CSAM, provided by FBI Tampa Division. Based on the training and experience of other law enforcement officers and my own research, it was determined that several of the files depict children under the age of eighteen years engaged in sexual acts or lascivious exhibitions of the genitals that constitute child pornography as defined by

Title 18 U.S.C. § 2256. A few of the files are described below:

- a. Filename: c3546efd4c246975c86b886a4ab18e8b  
Description: This image depicts a nude prepubescent female lying on her back with her legs spread open and up in the air. She has what appears to be a pencil shaped object in her hand penetrating her vagina. There appears to be an adult hand penetrating her anal cavity with an index finger.
- b. Filename: 61ff8a7394609d6bcf2c88644cfb06d6  
Description: This image depicts a prepubescent female, wearing what appears to be a swimsuit with pinkish purple and white stripes, laying on her back being penetrated by an erect penis while the male's hand is pressing down on her stomach.
- c. Filename: d26f218b696fc17a05549d9c4d6ef84  
Description: This image depicts a nude prepubescent female laying next to a nude adult male, both are lying on their backs, and another nude female is on her knees hovering over the male. The nude adult male has his arm wrapped around the nude prepubescent female with his hand placed on her vagina and his other arm is wrapped around the thigh of the nude female hovering over him.
- d. Filename: 383cb4fd49ef0f9fld89dec217414784  
Description: This image depicts a prepubescent female with her hands grabbing her butt as she places her index finger on her anal cavity, while a toothbrush is protruding upright out of her vagina.

25. Your affiant conducted postal checks and it was confirmed that VARNEY receives mail at 12324 South Land Avenue, Oklahoma City, Oklahoma, 73170. VARNEY does not receive mail at 8300 NW 10th St., Apt. 2, Oklahoma City, Oklahoma 73127.

26. On November 6, 2023, a Kik preservation request was submitted to Kik c/o MediaLab.AI. Inc. for records associated to subscriber information linked to "Okcsparky" and email account kraigvarney76@gmail.com.

27. On November 7, 2023, pursuant to the preservation request regarding username Okcsparky, Kik approved the preservation request KIK-17250.

28. On December 4, 2023, a federal search warrant was executed at 8300 NW 10th St., Apt. 2, Oklahoma City, Oklahoma 73127. VARNEY and Kelly Watson were in the residence when the search warrant was executed. Based on the interview with Kelly Watson, VARNEY had



lived in the residence since December 2022. Further it was confirmed that VARNEY used kraigvarney76@gmail.com as his email account. Two firearms were found at the residence and VARNEY was arrested and soon thereafter charged by Complaint for a violation of 18 U.S.C. § 922(g)(1).

**CONCLUSION**

29. Based on the above information, there is probable cause to believe that the foregoing laws have been violated, and that evidence, fruits, and instrumentalities of these offenses are located within the information requested in Attachment B, associated with the **SUBJECT ACCOUNT**.

30. Based upon the foregoing, I respectfully request that this Court issue a search warrant for the **SUBJECT ACCOUNT**, described in Attachment A, authorizing the seizure of the items described in Attachment B to this Affidavit.



Shane C. Robinson  
Special Agent  
Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me this 19<sup>th</sup> day of December 2023.



SHON T. ERWIN  
United States Magistrate Judge

**ATTACHMENT A**

**PROPERTY TO BE SEARCHED**

This warrant applies to information associated with the Kik Messenger online account “Okcsparky” that is stored at premises controlled by Kik c/o MediaLab.AI Inc., a company headquartered at 8023 Beverley Blvd. Ste 1144, Los Angeles, California, 90048, which accepts legal process via <https://app.kodexglobal.com/kik/signup> Government Request Portal.

**ATTACHMENT B**  
**LIST OF ITEMS TO BE SEIZED**

1. To the extent that the information described in Attachment A is within the possession, custody, or control of Kik c/o MediaLab.AI Inc. (the “Provider”), including any emails, messages, images, videos, records, files, logs, or information that has been deleted but is still available to the Provider, or has been preserved pursuant to a request made under 18 U.S.C. § 2703(f), the Provider is required to disclose the following:

2. IP addresses associated with Kik account username “Okcsparky” from June 3, 2022, to December 4, 2023.

3. All transactional chat logs associated with Kik account username “Okcsparky” from June 3, 2022, to December 4, 2023;

4. The content of all messages associated with Kik account username “Okcsparky” from June 3, 2022, to December 4, 2023;

5. All images and video associated with Kik account username “Okcsparky” from June 3, 2022, to December 4, 2023;

6. A date-stamped log showing the username that Kik account username “Okcsparky” added and/or blocked from June 3, 2022, to December 4, 2023;

7. Any abuse reports associated with Kik account username “Okcsparky” from June 3, 2022, to December 4, 2023; and

8. The Registration IP address and emails associated with Kik account username “Okcsparky” from June 3, 2022, to December 4, 2023.